

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**JONATHAN FELPS, Individually and  
On Behalf of All Others Similarly Situated,**

**Plaintiffs,**

**V.**

**MEWBOURNE OIL COMPANY, INC.,  
and D. DREW GREENE,**

## Defendants.

**§ 87(2)(b)**

**Civil Action No. 2:18-CV-00811-MV-GJF**

## **JOINT MOTION TO STAY PROCEEDINGS AND DEADLINES**

Plaintiff Jonathan Felps (“Plaintiff”) and Defendants Mewbourne Oil Company, Inc. and D. Drew Greene (“Defendants”) (collectively, the “Parties”) hereby file this Join Motion to Stay Proceedings and Deadlines as follows:

## I. BACKGROUND

1. Plaintiff filed this action on August 22, 2018. Plaintiff alleged that he and other lease operators were denied overtime pay under the Fair Labor Standards Act and the New Mexico Minimum Wage Act.

2. Defendants answered and denied the material allegations in Plaintiff's complaint.

3. On May 18, 2020, the Court conditionally certified the matter as a collective action.

On November 16, 2020, the Court certified a Rule 23 class.

4. On August 11, 2022, the Parties participated in mediation. After the mediation, the Parties reached a settlement. The Parties intend to memorialize the terms and conditions of the settlement in a written agreement.

## II. STAY

5. The Parties intend to submit a settlement agreement to the Court for approval.

6. The Parties request that the Court stay the remaining deadlines to conserve the Parties' resources and promote judicial economy.

## III. CONCLUSION AND PRAYER

For these reasons, the Parties request that this Court grant this joint motion and stay the case.

Respectfully submitted this 7th day of October, 2022.

/s/ Daniel A. Verrett

Daniel A. Verrett  
daniel@morelandlaw.com  
Edmond S. Moreland, Jr.  
edmond@morelandlaw.com  
**MORELAND VERRETT, P.C.**  
700 West Summit Drive  
Wimberly, Texas 78676  
Telephone: (512) 782-0567  
Facsimile: (512) 782-0605

**ATTORNEYS FOR PLAINTIFF**

/s/ John B. Brown

John B. Brown  
john.brown@ogletreedeakins.com  
Jeremy W. Hays  
jeremy.hays@ogletreedeakins.com  
**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**  
8117 Preston Road  
Dallas, Texas 75225  
Telephone: (214) 987-3800  
Facsimile: (214) 987-3926

**ATTORNEYS FOR DEFENDANT  
MEWBOURNE OIL COMPANY**

/s/ Richard E. Olsen

Richard E. Olson  
rolson@hinklelawfirm.com  
Chelsea R. Green  
cgreen@hinklelawfirm.com  
**HINKLE SHANOR LLP**  
400 Pennsylvania, Suite 640  
Roswell, New Mexico 88201  
Telephone: (575) 622-6510  
Facsimile: (575) 623-9332

**ATTORNEYS FOR DEFENDANT  
D. DREW GREENE**

**CERTIFICATE OF SERVICE**

I certify that on October 7th, 2022, the foregoing document was filed with the Clerk of the Court using the Court's CM/ECF system, which will send notification of such filing to counsel of record for all parties.

/s/ John B. Brown

John B. Brown